

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**John Doe HM, an individual,**

**PLAINTIFF**

**VS.**

**City of Creve Coeur, Missouri**

**John Beardsley, *Individually and in his  
Official Capacity as Police Chief in the Creve  
Coeur Police Department***

**Creve Coeur Board of Police Commissioners**

**Robert Hoffman, Edward Umphres, Eleanor  
Glovinsky, Elliot Cytron, David Murray,  
Janice Gale, Charles Peyton, Jack Lite  
Bob Pennell, Al Schopp, Jr., and William  
Kisling, *in their capacities as members of the  
Creve Coeur Board of Police Commissioners /  
Police Committee***

**DEFENDANTS**

**NO.**

**PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM**

COMES NOW, Plaintiff, through counsel, and moves this Court pursuant to MO. R. Civ.

Proc. 52.01 et seq. and F.R.C.P. 17 for an order allowing him to use the pseudo name

John Doe HM. The reason for this request is as follows:

1. Plaintiff was a victim of sexual abuse. It was this status as a sexual abuse survivor that caused, at least in part, the above-named defendants to perceive Plaintiff as disabled under the ADA, Rehabilitation Act and Missouri Human Rights Act.

2. The Plaintiff in this matter was a plaintiff in a matter in this District concerning the childhood sexual abuse described by defendants in their position statement with the EEOC. The matter in which this Plaintiff had previously been involved was ordered sealed by the trial judge, Hon. Stephen Limbaugh. Additionally, the trial judge ordered that the parties were to proceed by pseudonyms in the other case.
3. As that case will have relevance to the matter at hand, identifying plaintiff by name in this matter will undercut the order previously issued by Judge Limbaugh concerning the confidentiality of the matters in the previously filed case.
4. Given the unique nature and circumstance of the matter, the Plaintiff believes that if he were required to use his name in the prosecution of this lawsuit, he and his family will be subject to public ridicule and humiliation.
5. Additionally, given the unique procedural posture of this case and the related filing, Plaintiff believes that if he were required to use his name in the prosecution of this lawsuit, he will could be in violation of the orders and agreements in the other matter.

WHEREFORE, Plaintiff requests an order pursuant to MO. R. Civ. Pro. 52.01 et. seq. and F.R.C.P. 17, allowing them to use the pseudo name John Doe 88.

Respectfully submitted,

/s/ Rebecca M. Randles

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